

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

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Satheesh Marimuthu, *et al.*

Plaintiffs,

Civil File No.: 1:13-cv-499

v.

Signal International LLC, *et al.*,

Defendants.

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**JOINT MOTION FOR PROPOSED ORDER REGARDING DISCOVERY  
DISPUTE**

**NOW COMES**, Plaintiffs and Defendants in this matter hereby stipulate and file this Joint Motion for Proposed Order Regarding Discovery Dispute, asking the Court to issue an Order regarding various discovery related issues.

**WHEREAS**, Signal has issued discovery requests and may seek deposition testimony regarding information and documents that Plaintiffs do not believe are discoverable under the Federal Rules of Civil Procedure, including information and documents relating to Plaintiffs' T Visa applications, employment authorization documents, social media accounts, current employment and income, and citizenship and immigration status following their departures from Signal;

**WHEREAS**, Plaintiffs believe they are entitled to a protective order preventing the disclosure because many of the documents requested are irrelevant and the *in terrorem* effect it would have on Plaintiffs and similarly situated individuals;

WHEREAS, Signal believes that it is entitled to all of the information and documents it has requested, without limitation;

WHEREAS, the parties wish to avoid the time and expenses associated with motion practice;

WHEREAS, the Eastern District of Texas has previously issued two Orders regarding similar issues, *See Joseph, et al. v. Signal International, LLC, et al*, Doc. Nos. 148, 228 (Case No. 13-cv-00324) (E.D. Tex. Oct. 15, 2014; Feb. 24, 2015);

**NOW, THEREFORE, IT IS STIPULATED AND AGREED** by the parties, through their respective undersigned attorneys, that the Court, in its discretion, may issue an Order with the following terms:

The parties will comply with the Order issued in *Joseph, et al. v. Signal International, LLC, et al*, Doc. No. 148 (Case No. 13-cv-00324) (E.D. Tex. Oct. 15, 2014), as though it had been entered in this case;

Defendants shall be precluded from using information or documents produced pursuant to this Stipulation and Order in any other matter pending in the Eastern District of Texas or Eastern District of Louisiana, or any other future dispute related to Signal's recruitment of Indian workers to work at its facilities in Mississippi and Texas following Hurricane Katrina;

Plaintiffs retain the right to object to the admissibility at trial or any other subsequent proceeding of any document or any information produced pursuant to this Stipulation and Order;

Plaintiffs retain the right to seek a protective order or object to the production of documents or information not contemplated or addressed by the Order issued in *Joseph, et al. v. Signal International, LLC, et al*, Doc. No. 148 (Case No. 13-cv-00324) (E.D. Tex. Oct. 15, 2014);

Plaintiffs and Signal retain the right to appeal the Order issued in *Joseph, et al. v. Signal International, LLC, et al.*, Doc. No. 148 (Case No. 13-cv-00324) (E.D. Tex. Oct. 15, 2014), as though it had been entered in the above captioned dispute;

WHEREFORE, Plaintiffs and Defendants hereby respectfully request the Court enter an Order regarding the discovery disputes discussed in this Motion.

Date: April 10, 2015

By: /s/ Eric H. Findlay  
Eric H. Findlay  
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Date: April 10, 2015

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Signal International Texas, L.P.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing JOINT MOTION FOR PROPOSED ORDER REGARDING DISCOVERY DISPUTE was filed electronically on April 10, 2015. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: April 10, 2015

*/s/ Eric H. Findlay*  
Eric H. Findlay